

August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov
Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Rudi's Organic Bakery LLC supports the continued allowance of the following substance(s) in order to maintain the quality and integrity of our finished product:

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.
Ascorbic Acid	205.605 (b)	We use ascorbic acid as an oxidizing agent. It helps natural gas to form in the bread dough, creating volume in the oven. We use it in place of conventional, synthetic dough conditioners. There is no organic alternative. We feel that discontinuing the use of ascorbic acid would jeopardize our finished product.
Yeast (grown on non-synthetic substances)	205.605 (a)	We use a fresh baker's yeast grown on molasses as a traditional leavening agent. No organic yeast we have tested performs the same. We feel that discontinuing the use of fresh baker's yeast would jeopardize our finished product.
Lecithin (unbleached)	205.606 (d)	We use a non-GMO, unbleached soy lecithin as an emulsifier, in place of conventional, synthetic dough conditioners. It aids in incorporation of the ingredients in the dough. We feel that discontinuing the use of non-GMO, unbleached soy lecithin would jeopardize our finished product.
Enzymes	205.605 (a)	We use non-synthetic, vegan enzymes as a shelf life extender in our breads. There is no organic alternative. We feel that discontinuing the use of said enzymes would jeopardize our finished product.

Rudi's Organic Bakery LLC, is committed to the mission of the NOP and the organic industry as a whole. But, there are certain substances that have no organic alternative at this time that we feel are comparable in quality and performance as the conventional counterpart, and for the current time we rely upon said items to produce our fine products. We feel strongly that if any of the above mentioned substances do become available in a suitable and high quality organic form that we will make the transition as quickly as possible.

Sincerely,

Suzanne S. Murphy
Purchasing Agent
Rudi's Organic Bakery LLC
3300 Walnut Street, Unit C
Boulder CO, 80301
303-447-0495 x 4670
Fax 303-447-0516
smurphy@rudisbakery.com

Cc: Organic Trade Association
National Organic Standards Board

Attachment: "Evaluation Criteria for Substances Added to the National List"

Attached is the website that contains the "Evaluation Criteria for Substances Added to the National List". It is highly suggested that this evaluation be submitted with comments.

http://www.ams.usda.gov/nop/Newsroom/SunsetDocFedReg06_05.pdf